

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

FILED  
2025 JUL 15 P 3:25

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Claimant, Pavel Vorobets  
Claim Number: 85324

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Objection Deadline: July 15, 2025 at 4:00 P.M. ET

CLERK  
US BANKRUPTCY COURT  
DISTRICT OF DELAWARE

**CLAIMANT 85324'S RESPONSE**  
**IN OPPOSITION TO THE DEBTORS' 181st OMNIBUS OBJECTION**

Claimant 85324, Pavel Vorobets, herein submits his response to the Debtors' 129<sup>th</sup> Omnibus Objection. In the 181st Omnibus Objection, the Debtors objected to the Claimant's Proof of Claim, stating that after "Based on this review, the FTX Recovery Trust submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's account." *See* Schedule 1 of Debtors' 129th Omnibus Objection (Doc. No. 30631-2) at p. 18.

85324	Name on file	FTX Trading Ltd.	USD	17,000.00000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				

However, contrary to the Debtors' objection that the asserted amounts do not align with the records maintained by the Trust, the FTX Customer Claims Portal confirms that Claimant 85324 held digital asset positions supporting a total claim value of **\$21,904.47 (USD)**. Furthermore, the screenshot provided below, which was pulled directly from the FTX Customer Claims Portal, reflects the following holdings at the time of bankruptcy:

Total Customer Entitlement Claim\$7,397.10 USD

Balances

Deposits

Withdrawals

Positions

Fills

P2P Transfers

Airdrops

Ref

Positions

Market	Side	Position Size	USD Value
BTC-PERP	Long	0.3 BTC	\$5,132.40
CHZ-PERP	Long	26,150 CHZ	\$4,896.59
CRO-PERP	Long	62,040 CRO	\$5,127.61
ETH-PERP	Long	4.5 ETH	\$5,504.63

Rows per page: 100

1-4 / 4

By applying the cryptocurrency values from the Conversion Table to the positions held by Claimant at the time of the bankruptcy, the Claimant has a total entitlement of \$21,904.47 (USD), as set forth below:

- BTC 0.3 x \$16,871.63 = \$5,061.49
- CHZ 26,150 x \$0.2197552 = \$5,746.60
- CRO 62,040 x \$0.0875500 = \$5,431.60
- ETH 4.5 x \$1,258.84 = \$5,664.78

**Total Entitlement Owed: \$21,904.47**

As such, Claimant respectfully disagrees with the Debtors' objection, as the Debtors' own Customer Claims Portal confirms that Claimant 85324 held digital asset positions at the time of bankruptcy that support a total claim value of \$21,904.47 (USD). Wherefore, Claimant 85324 respectfully moves for an order modifying his entitlement to \$21,904.47 (USD).

**CERTIFICATE OF SERVICE**

I, Daniel J. Thornburgh, hereby certify that the foregoing Claimant's Response in Opposition to the Debtors' 181<sup>st</sup> Omnibus Objection was filed with the United States Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, and a copy served on Counsel for Debtors and Debtors-in-Possession at [landis@lrclaw.com](mailto:landis@lrclaw.com), [brown@lrclaw.com](mailto:brown@lrclaw.com), [pierce@lrclaw.com](mailto:pierce@lrclaw.com), [dietdericha@sullcrom.com](mailto:dietdericha@sullcrom.com), [bromleyj@sullcrom.com](mailto:bromleyj@sullcrom.com), [gluecksteinb@sullcrom.com](mailto:gluecksteinb@sullcrom.com), and [kranzleya@sullcrom.com](mailto:kranzleya@sullcrom.com) on July 15, 2024.

By:

/s/ Daniel J. Thornburgh

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& Overholtz, PLLC  
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Fax: 850-916-7449  
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*Counsel for CLAIMANT 85324*

**EXHIBIT A to  
Claimant 85324's Response to 181th Objection**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

This Document Relates to:

Claimant, Pavel Vorobets  
Claim Number: 85324

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

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**DECLARATION OF DANIEL J. THORNBURGH**

I, Daniel J. Thornburgh, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am over the age of eighteen and competent to make this declaration.
2. I submit this declaration in support of Claimant 85324's response to the objection filed by the Debtors in the above-captioned bankruptcy case regarding Claimant 85324's Proof of Claim.
3. The facts set forth in this declaration are based on my personal knowledge, my review of relevant documents, and information available to me in my capacity as the legal representative of Claimant 85324.
4. Attached hereto as Exhibit 1 is a true and correct copy of a screenshot from the FTX Customer Claims Portal for Claimant 85324 from December 2, 2024 and July 15, 2025.
5. Claimant's Claim was originally included on the 129th Omnibus Objection, but withdrawn. Debtors' then included Claimant 85324's Claim on the 181st Objection.

6. The information contained in Exhibit 1 accurately reflects the data provided by the FTX Customer Claims Portal as of July 15, 2025.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this 15<sup>th</sup> day of July, 2025, at Pensacola, Florida.

/s/ Daniel J. Thornburgh  
Daniel J. Thornburgh, Esq.

**EXHIBIT 1 to**  
**Daniel J. Thornburgh Declaration in**  
**Support of Claimant's Response to**  
**181th Objection**

Account ID 17168288

Unique Customer Code 806515

Email pvorobets@hotmail.com

Platform FTX\_COM

FTX

STEP 1  
Initiate Account Owner Authentication

STEP 2  
Verify Identity of the Original FTX Account Owner

STEP 3  
KYC

STEP 4  
View Account Balances

Portfolio

Main Account

Total Customer Entitlement Claim

\$7,397.10 USD

Balances Tab Customer Entitlement Claim

-\$13,264.12 USD

Positions Tab Customer Entitlement Claim

\$20,661.22 USD

Balances

Deposits

Withdrawals

Positions

Fills

P2P Transfers

Airdrops

Ref >

Privacy

FAQ

Support

User Guide



English

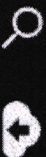
My Account

Total Customer Entitlement Claim

\$7,397.10 USD

Balances Deposits Withdrawals Positions Fills P2P Transfers Airdrops Ref >

Positions



Market	Side	Position Size	USD Value
BTC-PERP	Long	0.3 BTC	\$5,132.40
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CRO-PERP	Long	62,040 CRO	\$5,127.61
ETH-PERP	Long	4.5 ETH	\$5,504.63

Rows per page: 100 1-4 / 4

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## Creditor Data Details - Claim # 85324

### Creditor

Name on file  
Address on file

### Debtor Name

FTX Trading Ltd.

### Date Filed

09/29/2023

### Claim Number

85324

### Schedule Number

n/a

### Confirmation ID

n/a

## Claim Amounts

Claim Nature	Schedule Amount	C* U* D*	Asserted Claim Amount	C* U* F*	Current Claim Value	Claim Status
General Unsecured			Unliquidated	U	\$0.00	Expunged
Priority						
Secured						
503(b)(9) Admin Priority						
Admin Priority						
<b>Total</b>			<b>\$0.00</b>		<b>\$0.00</b>	

\*C=Contingent, U=Unliquidated, D=Disputed, F=Foreign

## Objection History

Date Filed	Objection Motion	Date Filed	Objection Order	Basis	Status
06/04/2025	(REDACTED) FTX Recovery Trust's One Hundred Eight.			Modified Claims	Pending
10/23/2024	(REDACTED) Debtors' One Hundred Twenty-Ninth (Non...	03/12/2025	Order Sustaining Debtors' One Hundred Twenty-Nint.	No Liability Claims	Ordered

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Nothing contained on this Site or in the Debtor's Schedules and Statements shall constitute an admission or waiver of any of the Debtor's rights to assert claims or